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VIA EFILING

Ms. Jocelyn Boyd
Interim Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, South Carolina 29210

Re: *Request for Commission to suspend and remove DSS/DHHS certification requirement*
Proceeding to Establish Guidelines for an Intrastate Universal Service Fund
Docket No. 1997-239-C

Dear Ms. Boyd:

The Commission granted the funding request of the South Carolina Office of Regulatory Staff ("ORS") in Order No. 2005-296. In that order, the Commission describes the Lifeline Eligibility Verification process based upon testimony submitted by ORS witness, Katie Morgan. The first step in that description requires the customer to complete the Lifeline Authorization Form and submit it to the Department of Social Services (DSS) or the Department of Health and Human Services (DHHS) for certification. (Order at page 2).

The application process that evolved after the promulgation of this order does not align with the language in this order. Today, DSS and DHHS certify only a small fraction of the Lifeline applications prior to enrollment in the Lifeline program. At the time of application, the customer is required to show proof of Medicaid, Food Stamp, or TANF eligibility. Typically, the customer submits the application directly to the Eligible Telecommunications Carrier ("ETCs")/Carrier of Last Resort ("COLRs"). ORS does certify applications submitted by BellSouth Telecommunications, Incorporated d/b/a AT&T South Carolina ("AT&T") customers that file under the income eligibility requirement. The ETC/COLR is required to verify the continued eligibility of the Lifeline applicant at least once annually.

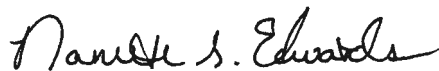
While the processing of Lifeline applications has been streamlined in this manner, ORS, on behalf of itself as Administrator and on behalf of the participating ETCs/COLRs, seeks Commission approval for the immediate suspension and removal of any requirement for DSS/DHHS certification prior to enrollment. DSS/DHHS personnel have informed ORS on several occasions that their offices could not process all Lifeline applications. For applications that are submitted to DSS/DHHS for certification prior to enrollment, ORS has received complaints from those Lifeline

applicants that they have experienced delays in receiving the Lifeline benefit. The vast majority of Lifeline applicants are not certified by DSS/DHHS prior to enrollment. Given the current economic conditions, attempting to funnel all Lifeline applications through DSS/DHHS would not be in the best interest of the Lifeline applicants or in the best interests of the ETCs/COLRs who are processing the applications for service. ORS would note that DSS/DHHS are state agencies that have experienced budget cutbacks. ORS is very appreciative of all the support that it has received from DSS and DHHS, but these agencies are not in a position to process the thousands of Lifeline applications annually. ORS is also not in a position to process and certify prior to enrollment the thousands of new Lifeline applications received each year.

ORS has contacted counsel for the COLRs¹ and is authorized to state that no COLR objects to the removal of any requirement contained in Order No. 2005-296 that the Lifeline applicant go to DSS/DHHS for certification prior to enrollment. The Lifeline applicant will continue to be required to provide proof of eligibility for Food Stamps, Medicaid, or TANF at the time of application. ORS will continue to certify those AT&T customers who apply to the ORS under the income eligibility requirements set forth in Paragraph 5 of the April 22, 2004 Agreement between BellSouth Telecommunications, Inc., and the Department of Consumer Affairs and confirming to AT&T. All ETCs and COLRs will verify the continued eligibility of the lifeline applicants at least once annually.

ORS respectfully requests that the Commission grant an immediate suspension of any requirement for DSS/DHHS certification prior to enrollment and that the Commission consider the removal of any such requirement on a permanent basis.

Very truly yours,

A handwritten signature in black ink, appearing to read "Nanette S. Edwards". The signature is fluid and cursive, with the first name being the most prominent.

Nanette S. Edwards

cc: Parties of Record

¹ AT&T is no longer a COLR effective October 1, 2009, but AT&T is not opposed to this request.